

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA  
VALDOSTA DIVISION**

**LEXIE HANDLEY,**

**Plaintiffs,**

**v.**

**WERNER ENTERPRISES, INC.  
and ACE AMERICAN INS. CO.,**

**Defendants.**

**CIVIL ACTION FILE NO.  
7:20-cv-00235-WLS**

**REMOVED FROM SUPERIOR  
COURT OF CLINCH COUNTY,  
CIVIL ACTION FILE NO.  
20CV-116**

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**DEFENDANT ACE AMERICAN INS. CO.'S  
MOTION FOR SUMMARY JUDGMENT**

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COMES NOW, ACE AMERICAN INS. CO., Defendant in the above-styled action (hereinafter "Defendant ACE"), and files this motion for summary judgment, relying on the following:

- A.** Declaration of Vincent Naimoli; and
- B.** Defendant ACE's Brief in Support of its Motion for Summary Judgment.

Respectfully submitted this 28th day of October, 2021.

[SIGNATURE PAGE FOLLOWS]

**HALL BOOTH SMITH, P.C.**

*/s/ Daniell R. Fink*

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**CERTIFICATE OF SERVICE**

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I hereby certify that on this day I have served a copy of the within and foregoing **DEFENDANT ACE AMERICAN INS. CO.'S MOTION FOR SUMMARY JUDGMENT** upon all parties to this matter by depositing a true copy of same in the U.S. Mail, proper postage prepaid, addressed to counsel of record as follows and/or filing said document with the CM/ECF system which will automatically send electronic notification to the following:

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This 28th day of October, 2021.

**HALL BOOTH SMITH, P.C.**

*/s/ Daniell R. Fink*  
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